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August 21, 2008

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Re: *United States v. Pirouz Sedaghaty*
CR 05-60008 HO
Discovery Issues

Dear Chris and Charles:

Consistent with Judge Hogan's statement that he was not terribly interested in seeing additional discovery pleadings and hoped that we would be able to work things out, we thought we would send this letter identifying a number of items that we believe should exist and need in order to prepare our defense. Please let us know at your earliest convenience whether you will be providing this information.

Before I get into a more detailed list, we want to thank you for agreeing to transfer the discovery materials to Portland and work with us to get them in electronic format. One of the issues that arose was whether the index numbers placed on top of the inmate letters would be copied. Jim Strupp and Colleen Anderson agreed that that matter would be referred to the attorneys. As we understand it, the government prepared an index of all of the letters. While we agreed that the numbers on top would not be scanned, we would very much appreciate your assisting us by providing a copy of that index. While we understand that an argument could be made that it is work product, the amount of time and effort that was spent is not one that makes a

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tremendous amount of sense to duplicate. Since the letters speak for themselves in the end, we are hopeful that you will provide the index that you created.

Again, consistent with Judge Hogan's desire that we work through discovery matters and avoid any discovery dispute about material that is normally provided, we ask you to take another look at your position with respect to the following paragraphs from our first motion for discovery and the supplement: A7, A13, A14, A15, A16, A18, A20, A21, A23, B8, B10, B31, B51, B52, B53, B56, B58, B59, B60, B61, B64, and B66. The additional requests are for:

1. All interview reports regarding contact with those people who asked the Court to order Pete to refrain from communicating with them during the pendency of the case.
2. The subpoena or subpoenas served on accountant Wilcox.
3. Access to the originals of all documents the government obtained from Wilcox. More specifically, did you get copies from him of which we have additional copies, or did you obtain originals from him? We also need to know whether you obtained any electronic data from Mr. Wilcox.
4. Reports of interviews or communications with all of the Board members of Al Haramain USA – Soliman Al Buthe, Aqeel Al Aqeel, Monsur Al Kadi.
5. The interview report with Raya Shokatfard refers to a previous interview. We need a report of that interview.
6. All reports of communications between all government agents and Laleh Zahedi.
7. A copy of the subpoena served by the government on First Escrow Inc.
8. A copy of all of the interview reports with Farhad, Datta Grover, Judy Mahoney, Jonah Sedaghaty, and Joseph Sedaghaty.
9. Reports of the installation of and products from the surveillance camera that was installed across from the Al Haramain Ashland building.
10. All reports of communication with all of the attorneys and accountants who worked with or for Mr. Sedaghaty or Al Haramain, Inc., or the Arborist.
11. Interview reports regarding investigation into Dar Us Islam Dawa.

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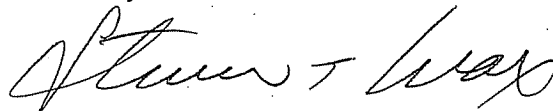
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12. We have to assume that you prepared computer forensic reports based on the analysis of the hard drives that were seized. We would certainly appreciate receiving copies of those.
13. We have the Debra Ingram interview reports but renew our request for interview reports with all the other employees at the Bank of America, American Express, or other financial institutions, and any other witnesses with whom the government spoke regarding any travelers checks. This aspect of the case is certainly within the heartland of the traditional cases handled by your office and we would hope that you handle the discovery in the same matter in the normal course. There is no question but that we would receive those reports.

We also renew in this letter the request for the traditional types of discovery requested in our motions. Again, in the normal course, there is no question but that you would provide most of that type of information. While we understand that we will fight about the classified and "terrorism" aspects of the case, we hope that there is no need, particularly in light of Judge Hogan's urging us to work together, to fight about the more traditional discovery issues.

We look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven T. Wax". The signature is fluid and cursive, with the first name "Steven" being more prominent.

Steven T. Wax
Federal Public Defender

STW/sls

cc: Larry Matasar